

Applicant is under no obligation to submit evidence of nonobviousness. *Id.* In the instant case, the Examiner has not pointed to any evidence in Fredlund or how knowledge of those skilled in the art, provide a suggestion or motivation to modify the reference teaching so as to produce the claimed invention of claim 1 of a single order with multiple recipients. See *In re Zurko*, 59 U.S.P.Q.2d 1693 (Fed. Cir. 2001) ([I]n a determination of patentability the Board cannot simply reach conclusions based on its understanding or experience - or on its assessment of what would be basic knowledge or common sense. Rather, the Board must point to some concrete evidence in the record in support of these findings).

Under *Vaeck*, absent any evidence of a cited suggestion or reasonable motivation in the Fredlund or Cok reference, or knowledge of those skilled in the art, for a single order specifying a plurality of recipients, *prima facie* obviousness of claim 1 (and dependent claims) has not been established. As such, it is respectfully requested that the § 103(a) rejection of independent claims (and dependent claims) be withdrawn and the claims be allowed.

Here, neither Fredlund nor Cok show the missing elements of the independent claims raised above, namely a method of distributing image prints printed on a plurality of printers to a plurality of recipients, the method comprising: receiving an order specifying a plurality of recipients and, for each specified recipient, a set of one or more images associated with that recipient; and for each recipient specified by the order, separating the images associated with the recipient into at least one printable unit of images to generate a contiguous run of prints for the recipient.

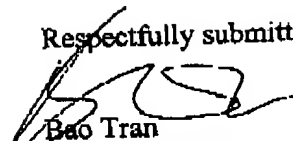
Hence, Fredlund, Cok, Shaked, Chan, Gringeri, Zorn, Juan, Church and Robertson, singly or in combination, cannot render the independent claims obvious. With respect to the dependent claims, they are allowable because they depend from allowable independent claims.

CONCLUSION

Applicants believe that the above discussion is fully responsive to all grounds of rejection set for the in the Office Action.

If for any reasons the Examiner believes a telephone conference would in any way expedite resolution of the issues raised in this appeal, the Examiner is invited to telephone the undersigned at 408-528-7490.

Respectfully submitted,



Bao Tran
Reg. No. 37,955